

SUBDIVISION: SPECIAL TRACTS				
RG	BLK	LOT	TRACT NUMBER NAME OF OWNER	ADDRESS
			1000	YORK MANNER TOWNHOMES THOMAS P. MATHEWS 7314 HANCOCK DR. WONDER LAKE, ILL. 60087
			1001	MEMORIAL BAPTIST CHURCH 4011 MEMORIAL BLVD. PORT ARTHUR, TEXAS 77640
			1002	PORT ARTHUR INDEPENDENT SCHOOL DIST.
			1003	P.O. Box 1388 SAME Port Arthur, Texas 77641
			1004	SAME
			1005	CITY OF PORT ARTHUR, Tx. P.O. Box 1089 Port Arthur, Texas 77640
			1006	ABRAHAM BRISCOE, JR. 5349 BRISCOE LD., PORT ARTHUR, Tx 77640
			1007	MID COUNTY DIRT PIT INC. P.O. Box 5054, Port Arthur, Tx. 77640
			1008	GULF PIPELINE CO. 1301 MCKINNEY, HOUSTON, Tx 77001
			<del>1009</del> 1020	K. E. E. DUNLAY 2638 25th ST., Port Arthur, Tx 77640
			1021	HENRY L. COLE 2601 23RD. ST., PORT ARTHUR, Tx 77640

SUBDIVISION: GORMAN PLACE

[illegible]

SUBDIVISION:

Boulevard Courts Addition

[illegible]



SUBDIVISION: BOULEVARD ACRES ADDITION

RG	BLK	LOT	NAME OF OWNER	ADDRESS
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[illegible]



SUBDIVISION: PARK PLACE No. 2

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	11	15	JEWELL M. PRYOR	2604 29 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	11	16	LURLENE MORAZAN	3001 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	17	CHARLES B. LOOKSEY JR.	3005 TYLER AVE. PT. ARTHUR, TEX. 77640
	11	18	J.O. GANDY	3011 TYLER AVE. PT. ARTHUR, TEX. 77640
	11	19	MICHAEL W. HAMILTON	3019 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	20	BIRDIE TROESTER	3027 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	21	F.J. VAN HESS	3035 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	22	N.W. PEREGO	3043 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	23	LAVAIA MALLET	3049 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	24	D.C. GAFFORD	3103 TYLER AVE. PT. ARTHUR, TEX. 77640
	11	25	KENNETH BLANCHETTE	3109 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	26	L.T. TOWNSEND	3115 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	27	ERNEST V. KING	3121 TYLER AVE. PT. ARTHUR, TEX. 77640
	11	28	GERALD R. MILLER	316 S. 2 <sup>1</sup> / <sub>2</sub> ST. NEDERLAND, TEX. 77627
	11	29	THOMAS A. THREADGILL	3133 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	30	DANNY CLARK	802 SOUTH AVE., PT. NECHES, TEX. 77651
	11	31	THOMAS SUMMERLIN JR.	6448 DIAMOND, PT. ARTHUR, TEX. 77640
	11	32	W.T. DUPREE	3147 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	33	FRANKIE THOMAS MANCANICE	3149 TYLER AVE., PT. ARTHUR, TEX. 77640
	11	34	BAR-DEE INVESTMENTS	2621 OLEANDER, GROVES, TEX. 77619

SUBDIVISION: PARK PLACE No. 3

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	12	12	ROBERT D. FEEMSTER	3349 PLATT, PT. ARTHUR, TEX. 77640
	12	13	SAME	
	12	14	CHARLES DANNY CARTER	3401 PLATT, PT. ARTHUR, TEX. 77640
	12	15	R.K. MYERS	3425 PLATT, PT. ARTHUR, TEX. 77640
	12	16	TIMOTHY W. SMITH, ETUX	3437 PLATT, PT. ARTHUR, TEX. 77640
	12	17	OZETE R. RAINES	3449 PLATT, PT. ARTHUR, TEX. 77640
	12	18	SAME	
	12	19	DELANO F. MAKESKA	3505 PLATT, PT. ARTHUR, TEX. 77640
	12	20	LEON KNIGHT	3533 PLATT, PT. ARTHUR, TEX. 77640
	12	21	GARY F. LANDRY	3549 PLATT, PT. ARTHUR, TEX. 77640
	12	22	FRANCES J. AMUNY	3601 PLATT, PT. ARTHUR, TEX. 77640
	12	23	SAME	
	12	24	LELANO LACY	3635 PLATT, PT. ARTHUR, TEX. 77640
	12	S/25	SAME	
	12	N/25	JAMES LEON CHELETTE	2800 15 <sup>TH</sup> ST. PT. ARTHUR, TEX. 77640
	12	26	SAME	
	12	27	DR. H.J. GIBLIN	5700 39 <sup>TH</sup> ST. GROVES, TEX. 77619
	12	28	SAME	
	12	29	SAME	
	12	30	WILLIAM A. PIUS N.2' OF 29 BROWN	3727 PLATT, PT. ARTHUR, TEX. 77640
	12	31	HERBERT C. OTEY JR.	3733 PLATT, PT. ARTHUR, TEX. 77640

SUBDIVISION: PARK PLACE No. 3 (CONT.)

[illegible]



SUBDIVISION: PARK PLACE MANOR ADDITION

[illegible]

SUBDIVISION: PARK PLACE No. 4				
RG	BLK	LOT	NAME OF OWNER	ADDRESS
	26	1	WILLIAM A. WILLIAMS	2909 ZION ST., PT. ARTHUR, TEX. 77642
	26	4	LOWELL G. ROLLINS, ETUX	4141 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	5	MARION T. MAIN	4201 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	6	RONNIE R. MCLELLAND	4209 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	7	EDMOND D. BOONE	4211 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	8	JOHN IMHOFF	4219 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	9	C.E. MCWILLIAMS	4225 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	10	MRS. J.H. NORVILLE	4231 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	11	BETTY FULLER	4237 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	12	ELDON W. ELLIS	4243 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	13	MARY HOFFPAUER	4249 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	14	PERRY S. FLECKMAN	P.O. BOX 1025, GROVES, TEX. 77619
	26	15	DONALD H. GLOVER	4311 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	16	GLADYS E. WALKER	22441 N. MAPLE PLACE, DEERFIELD, IL. 60015
	26	17	SAME	
	26	18	SALIM GERGES MOUSTAES	4341 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	26	19	M.S. LOTT	4349 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	28	1	RICHARD J. BOURGEOIS	4355 BIG BEND AVE., PT. ARTHUR, TEX. 77642
	28	2	JOE FORMAGUS	4359 BRYCE, PT. ARTHUR, TEX. 77642
	28	3	WILLIAM H. GRIFFITH	4365 BRYCE, PT. ARTHUR, TEX. 77642
	28	4	LEONARD R. KNIGHT	4400 BRYCE, PT. ARTHUR, TEX. 77642

SUBDIVISION: EDGEPORT ADDITION

[illegible]



SUBDIVISION:

HIGHLAND ADDITION

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	5	S. 84' 5	SHELTON & ROSA MEL FORREST	4748 FT. WORTH, PT. ARTHUR, TEX. 77140
	5	REST OF 5	R.C. EDISON	341 H.O. MILLS BLVD., PT. ARTHUR, TEX. 77640
	5	S. 134' 6	SAME AS S. 84' OF LT. 5	
	5	7	SAME AS S. 84' OF LT. 5	
	5	S. 1	RODNEY TEZENO	1239 WALD AVE., PT. ARTHUR, TEX. 77640
	5	2	LELA JOHNSON	5027 AUSTIN AVE., PT. ARTHUR, TEX. 77640
	5	4 & 3	LEON V. HOLTZCLAW	5940 MEADOW WAY, BEAUMONT, TEX. 77707
	6	E. 20' OF LT. 2 S. 99' OF LT. 1	IRVIN COLLINS	427 H.O. MILLS BLVD., PT. ARTHUR, TEX. 77640
	6	2	SAME AS S. 99' OF LT. 1	
	6	3	ROBERT C. & BEVERLY A. KING	445 H.O. MILLS BLVD., PT. ARTHUR, TEX. 77640
	6	4	SAME	
	6	5	SAME	
	7	1	PETER BATES	501 H.O. MILLS BLVD., PT. ARTHUR, TEX. 77640
	7	S. 124' 2	KEARNIS RICHARD	509 H.O. MILLS BLVD., PT. ARTHUR, TEX. 77640
	7	S. 124' 3	WILLIE HOLMES E.L. SABA	P.O. BOX 55 PT. ARTHUR, TEX. 77640
	7	N. 234' 4	LERDY CHAPMAN	P.O. BOX 193, PT. ARTHUR, TX. 77640
	7	N. 234' 5	SAME	
	7	N. 234' 6	SAME	

SUBDIVISION:				
RG	BLK	LOT	NAME OF OWNER	ADDRESS
J	8	1	WILLIAM DOORNBOS, ET.AL.	P.O. BOX 696 NEDERLAND, TEXAS 77627
		2	SAME	
		3	SAME	
		4	SAME	
K	8	1	SAME	
		2	SAME	
		3	SAME	
		4	SAME	
L	8	1	SAME	
L	8	2	CITY OF PORT ARTHUR	P.O. BOX 1089 PORT ARTHUR, TEXAS 77640
		3	SAME	
		4	SAME	
M	8	1	SAME	
		2	SAME	
N	8	2	SAME	
		3	SAME	
		4	SAME	

RG	BLK	LOT	NAME OF OWNER	ADDRESS
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[illegible]



SUBDIVISION:

### VAN BUCKNER ADDITION

[illegible]

SUBDIVISION: LARGE TRACT SHEET 1

RG	BLK	LOT	NAME OF OWNER	ADDRESS
P	8	1	TEXAS PIPELINE Co.	P.O. BOX 52332 HOUSTON, TEXAS 77052
		2	SAME	
		3	SAME	
		4	SAME	
		5	SAME	
P	9	4	GULF REF. & PURE TITLCO	P.O. BOX 52332 HOUSTON, TEXAS 77052
Q	9	1	GULF STATES UTILITIES CO.	LOCK DRAWER 2951 BEAUMONT, TEXAS 77704
Q	9	3	U.S. INDUSTRIAL CHEMICALS CO.	99 PARK AVE. ROOM 1094 NEW YORK, NEW YORK 10016
Q	8	3	SAME	
		4	SAME	
		5	SAME	
		6	SAME	
Q	7	N/W 5	SAME	
R	7	1	SAME	
		2	SAME	
		3	SAME	
		4	SAME	
		8	SAME	

SUBDIVISION: LARGE TRACTS SHEET 2

RG	BLK	LOT	NAME OF OWNER	ADDRESS
S	7	1	U.S. INDUSTRIAL CHEMICALS CO.	
		2	SAME	
S	6	1	SAME	
		7	SAME	
			SAME	
			SAME	
S	6	2	CHEVRON U.S.A., INC.	P.O. BOX 701 PORT ARTHUR, TEXAS 77640
		3	SAME	
S	5	1	SAME	
		7	SAME	
		8	SAME	
R	5	1	SAME	
		2	SAME	
		3	SAME	
		4	SAME	
		5	SAME	
		7	SAME	
		8	SAME	
Q	5	1	SAME	
		2	SAME	
		3	SAME	
		4	SAME	



SUBDIVISION: LARGE TRACTS SHEET 3

[illegible]

SUBDIVISION: LINCOLN ADDITION

SUBDIVISION: LINCOLN ADDITION

[illegible]

SUBDIVISION: RANGE - P, BLOCK - 8, LOT - 8

[illegible]



SUBDIVISION:

## PERKIN ADDITION

[illegible]

[illegible]

ADDRESS

INDEPENDENT SCHOOL DIST.

WILMA BREW

P.O. Box 4183, Ft. ARTHUR, Tex. 77640

SAME

1003

PT. ARTHUR INDEPENDENT  
SCHOOL DISTRICT

SUBDIVISION: LINCOLN PARK ADDITION				
RG	BLK	LOT	NAME OF OWNER	ADDRESS
		1	CITY OF PT. ARTHUR	
		2	SAME	
		3	SAME	
		4	SAME	
		Adjoining 24.65' to L. 1	SAME	
		S. 15'	5 SAME	
		Part of 5	MRS. BEATRICE STEVENSON	1221 GRANNIS AVE., PT. ARTHUR, TEX. 77640
		6	SAME	
		S. 5'	7 SAME	
		N. 25'	7 THOMAS J. GREEN	1241 GRANNIS AVE., PT. ARTHUR, TEX. 77640
		S. 25'	8 SAME	
		N. 5'	8 ANDREW MARSHALL	1249 GRANNIS AVE., PT. ARTHUR, TEX. 77640
		9	SAME	
		S. 15'	10 SAME	
		N. 15'	10 LEO COLE	1301 GRANNIS AVE., PT. ARTHUR, TEX. 77640
		11	SAME	
		12	SAME	
		S. 25'	13 SAME	
		N. 5'	13 LEROY STEWART	4029 W. BOULEVARD, APT. D, L.A., CALIF. 90008
		14	SAME	
		S. 15'	15 SAME	



[illegible]

SUBDIVISION: PORT ARTHUR HEIGHTS ADDITION

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	18	1	DAVINE LOUIS	208 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	18	2	WILLIE LOUIS	208 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	18	3	RAYMOND FREDDIE	218 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	18	4	THOMAS A. LACOUR	P.O. Box 1396, PT. ARTHUR, TEX. 77640
	18	5	SAME	
	18	6	PIERRE GEORGE	240 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	18	7	JIM WALTER HOMES	P.O. Box 22601, TAMPA, FLORIDA 33622
	19	1	HARRY LYONS	300 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	19	2	SAME	
	19	3	CHRISTOPHER & MAUREEN VELTZ	320 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	19	4	SAME	
	19	5	FRINKLER B. HEATH	2600 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	19	6	CLAUDE COMEAUX JR.	348 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	20	1	LONNIG LINDEN	400 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	20	2	MAK HANNAH	P.O. Box 6, PT. ARTHUR, TEX. 77640
	20	3	THOMAS A. LACOUR JR. ET EX.	430 W. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	20	4	SAME	
	20	5	GEORGE T. DARCEUIL	1948 TEXAS AVE., PT. ARTHUR, TEX. 77640
	20	6	SAME	
	21	1	NORRIS BRANCH	1927 TEXAS AVE., PT. ARTHUR, TEX. 77640
	21	8	MICHAEL SPOONER	1926 KANSAS AVE., PT. ARTHUR, TEX. 77640

SUBDIVISION: PORT ARTHUR HEIGHTS ADDITION (CONT.) page 2

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	22	1	BRENDA JOYCE REYNOLDS	2789 S. 5 <sup>TH</sup> ST., BEAUMONT, TEX. 77701
	22	2	SAME	
	22	3	URBAN RENEWAL	
	22	4	VETERANS ADMINISTRATION	2515 MURWORTH DR., HOUSTON, TEX. 77054
	22	5	SAMUEL MCGLODY	640 W. 19 <sup>TH</sup> ST. P. ARTHUR, TEX. 77640
	22	6	URBAN RENEWAL	
	23	1	ELTON HAYES JR.	700 W. 19 <sup>TH</sup> ST. P. ARTHUR, TEX. 77640
	23	2	SAME	
	23	3	GEORGE BROWN	730 W. 19 <sup>TH</sup> ST., P. ARTHUR, TEX. 77640
	23	4	SAME	
	23	5	LEROY JENKINS	815 W. 17 <sup>TH</sup> ST., P. ARTHUR, TEX. 77640
	23	6	CHARLIE MITCHELL ETAL.	825 WELLFORD, P. ARTHUR, TEX. 77640
	24	1	RICHARD DORSEY	1976 TERMINAL RD., P. ARTHUR, TEX. 77640
	24	2	SAME	
	24	3	SAME	
	24	4	SAME	
	24	5	ANTOINE FONTENETTE	847 W. 18 <sup>TH</sup> ST., P. ARTHUR, TEX. 77640
	24	6	SAME	
	24	7	SAME	
	10	2	BERNIE AIKELS	912 W. 18 <sup>TH</sup> ST., P. ARTHUR, TEX. 77640
	10	3	SAME	



SUBDIVISION: PORT ARTHUR HEIGHTS ADDITION (CONT.) page 3

R#	BLK	LOT	NAME OF OWNER	ADDRESS
	10	4	EDDIE SENIGAR	3196 WASHINGTON Blvd., BEAUMONT, TEX. 77705
	10	5	WALLACE J. THORNTON	949 W. 17 <sup>TH</sup> St., PT. ARTHUR, TEX. 77640
	10	6	SAME	
	9	2 3	CHARLES & RUTH TAYLOR	1000 W. 17 <sup>TH</sup> St. PT. ARTHUR, TEX. 77640
	9	4	SAME	
	9	7	HOWARD, YVONNE & EARLY ARMSTRONG	1031 W. GULFWAY DR., PT. ARTHUR, TEX. 77640
	9	5	CITY OF PT. ARTHUR	
	9	6	CITY OF PT. ARTHUR	
	42	1	THRU 27; SAME AS BLK. 9 LOT 6	
	W		PRINCE HALL TRUST C/O PRUDENTIAL CO.	P.O. Box 9049, VAN NUYS, CALIF. 91409
	V		SAME	
	U	1-6	SAME	
	U	7	PT. ARTHUR HOUSING AUTHORITY	
	T	7	SAMUEL JEAN	5248 LINKWOOD, PT. ARTHUR, TEX. 77640
SPECIAL TRACT	1005		CARVER TERRACE APARTMENTS	OWNED BY CITY OF PT. ARTHUR

SUBDIVISION: STILLWELL HEIGHT

## STILLWELL HEIGHT

RG

BLK

LOT

NAME OF OWNER

ADDRESS

N. 81'	of
--------	----

46

OLIVER VAN WRIGHT

935 E. 19<sup>TH</sup> ST., PT. ARTHUR, TEX. 77640.

SUBDIVISION: CITY OF PT. ARTHUR

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	339	N. 65' 1	CITY OF PT. ARTHUR	P.O. Box 1089 Port Arthur, Texas 77640
	339	N. 65' 2	SAME	
	339	N. 65' 3	SAME	
	339	N. 65' 4	SAME	
	339	N. 65' 5	SAME	
	339	N. 65' 6	SAME	
	340	1	SAME	
	340	N. 65' 5	SAME	
	340	N. 65' 6	SAME	
	341	1	SAME	
	341	N. 65' 5	SAME	
	341	N. 65' 6	SAME	
	342	1	SAME	
	342	2	SAME	
	349	1	SAME	
	349	2	SAME	
	350	1	SAME	
	350	2	SAME	
	359	1	SAME	
	359	2	SAME	
	360	1	SAME	



SUBDIVISION: CITY OF PT ARTHUR (CONT.)

RG BLK LOT NAME OF OWNER ADDRESS

	360	2	SAME	
	371	1	SAME	
	371	2	SAME	
	372	1	SAME	
	372	2	SAME	
	417	2	SAME	
	417	3	SAME	
	418	2	SAME	
	418	3	SAME	
	429	2	SAME	
	429	3	SAME	
	430	2	SAME	
	430	3	SAME	
	439	2	SAME	
	439	3	SAME	
	440	2	SAME	
	440	3	SAME	
	447	2	SAME	
	447	3	SAME	
	448	2	SAME	
	448	3	SAME	

SUBDIVISION: CITY OF PT. ARTHUR (CONT.)

RG	BLK	LOT	NAME OF OWNER	ADDRESS
	452	2	SAME	
	452	3	SAME	
	453	2	SAME	
	453	3	SAME	
	453	N/4	BERNARD ALEXANDER	318 ZWOLLE BLVD., PT. ARTHUR, TEX. 77640
	453	S/4	ROBERT G. LOPEZ	5130 4 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	453	5	SHIRLEY CHESTON	305 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	454	6	JEANNE E. ROWLY	1946 DALLAS AVE., PT. ARTHUR, TEX. 77640
	455	1	IRBEN LEVIEGE	4849 AUSTIN AVE., PT. ARTHUR, TEX. 77640
	455	2	LEROY DENNIS	226 E. 18 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	455	3	PAUL ALMONTE	234 E. 19 <sup>TH</sup> ST., PT. ARTHUR, TEX. 77640
	455	N/4	ELMA QUINTELA MENDEZ	3103 CALLOWAY DR., NEDERLAND, TEX. 77629
	455	N/5	SAME AS N/4	
	455	S/4	MAE S. WHITE	811 E. THOMAS, PT. ARTHUR, TEX. 77640
	455	S/5	SAME N/5	
	463	1	ARNOLD C. FLORES	2721 MONTROSE AVE., GROVES, TEX. 77619
	463	2	SAME AS LT. 1	
	463	3	SAME AS LT. 1	
	462	E/11	MAE S. WHITE	811 THOMAS BLVD PT. ARTHUR, TEX. 77640
	462	W/11	CITY OF PT. ARTHUR	
	462	12	SAME AS W/11	

SUBDIVISION:

CITY OF P. ARTHUR (CONT.)

RG

BLK LOT

LOT

NAME OF OWNER

ADDRESS

462

1

O.M. DeROUEN

5049 6<sup>TH</sup> ST., PT. ARTHUR, TEX. 77640

462

2

SAME AS 1

460

ALL

M.C. O'NEAL

3322 8<sup>TH</sup> ST. PT. ARTHUR, TEX. 77640



# TEXAS WATER COMMISSION

1. KOD  
2. ~~Bonnie~~ (?)  
Rich

Paul Hopkins, Chairman  
Ralph Roming, Commissioner  
John O. Houchins, Commissioner



Larry R. Soward, Executive Director  
June 10, 1987

C. Martin Wilson III, General Counsel  
James K. Rourke, Jr., Chief Examiner  
Mary Ann Hefner, Chief Clerk

Mr. L. T. Townsend  
Manager, Port Arthur Area  
Texaco Refining and Marketing, Inc.  
P. O. Box 712  
Port Arthur, Texas 77640



Re: Industrial Solid Waste Registration No. 30121  
Permit Application No. 51073  
Jefferson County

Dear Mr. Townsend:

The Texas Water Commission (TWC) has received your letter dated May 15, 1987, requesting a 30-day extension for submittal of your response to the technical deficiencies in the Part B Hazardous Waste Permit Application. Based upon the circumstances outlined in your letter, the deadline has been extended to June 22, 1987. Please note that delays past this date may result in dismissal or denial of the application, recommendation to authorize only compliant portions of the facility, or referral of the incomplete application to the U. S. Environmental Protection Agency for administration of civil penalties.

Regarding item III. F.5. and 6: Site Assessment/Facility Reconnaissance Investigation, the intent of the Commission is that the Facility Reconnaissance Investigation Plan be modified to include items listed in the Notice of Deficiency letter, but the reconnaissance investigation and the land treatment demonstration are not to begin until after the permit is issued.

If you have any questions regarding this matter, please contact Leon Byrd, at 512/463-7977.

Sincerely,

A handwritten signature in cursive script that reads "Minor Brooks Hibbs".

Minor Brooks Hibbs, Chief  
Permits Section  
Hazardous and Solid Waste Division

CLB:vh

cc: Shirley Workman, EPA Region VI Office - Dallas  
Bill Honker, EPA Region VI Office - Dallas  
TWC District 6 Office - Orange  
TWC H&SW Enforcement Section - Austin  
Russ Kimble, TWC Reports and Management Section - Austin



# TEXAS WATER COMMISSION

Honker  
Foster  
Rich

Paul Hopkins, Chairman  
Ralph Roming, Commissioner  
John O. Houchins, Commissioner



Larry R. Soward, Executive Director  
Mary Ann Hefner, Chief Clerk  
James H. Rourke, Jr., General Counsel

April 20, 1987

Mr. L. T. Townsend  
Manager, Port Arthur Area  
Texaco Refining and Marketing, Inc.  
P. O. Box 712  
Port Arthur, Texas 77640



CERTIFIED MAIL

Re: Industrial Solid Waste Registration No. 30121  
Permit Application No. 51073  
Jefferson County

TXD 008097529 IV

Dear Mr. Townsend:

We have completed a review of your hazardous waste permit application. Our review indicates that insufficient information was presented to demonstrate compliance with the Texas Administrative Code (TAC) Sections 305.45 and 305.50. In addition to other requirements, the aforementioned Sections adopt the requirements listed in Title 40 of the Code of Federal Regulations (CFR) Parts 270.13-.17, and 270.20. The deficiencies in the application are detailed below, following the format of the Texas Part B Hazardous Waste Permit Application form and instructions, which you will find enclosed:

## PART B

### II.D.: Waste Analysis Plan

Please expand the Waste Analysis Plan (Vol. I, Section II-D) to include the following elements:

- Narrative description of equipment/procedures for collecting representative samples for analysis.
- Quality assurance/quality control for waste sampling and analysis in all phases; and
- Provisions for any changes/revisions in waste analysis plan.

The Waste Analysis Plan must be modified to be a self-supporting document with no dependence on cross-reference to other portions of the permit application.

### II.E.: Personnel Training Program:

Please provide qualification of the hazardous waste/solid waste training director. The applicant must demonstrate that the program is directed by a person trained in hazardous waste management. Also describe how the facility personnel take part in an annual review of the initial training. Please refer to item II-E.1. through 5. of the enclosed Part B instructions.



Mr. L. T. Townsend  
Page 2  
April 20, 1987

### III. Engineering Reports

#### III.B.:

Please provide one summary for each of: III.A. - General Engineering Reports; III.B. - Container Storage Area; and III.F. - Land Treatment Unit, all of which should be attachable to the corresponding engineering design reports.

#### III.F.2. and 3.: Run-on Diversion/Run-off Control

Please indicate, using a topographic map as a basis, the location of each of the surface water control structures and/or soil erosion control structures (such as terraces, dikes, sedimentation ponds, ditches, canals) that will be used to control run on and run off. For each structure, include a typical cross-section indicating elevation, inclination of slope, construction material specifications, and construction methods, and design calculations (based on storm frequency, duration, and intensity), where applicable. Also, please submit a copy of the new drainage plan which will route the collected run-off to Reservoir No. 12. Please submit any available analytical data on run-off water from the land treatment area.

#### III.F.4.: Wind Dispersal

Please provide a better description of practices proposed for wind dispersal control.

#### III.F.5. and 6.: Site Assessment/Facility Reconnaissance Investigation

A detailed reconnaissance investigation program is needed to define spatial distribution of hazardous constituents across the entire land treatment unit, and to help formulate the land treatment demonstration. Please modify your facility reconnaissance investigation program to include the following elements:

- establishment of a background soil-core sampling and analysis;
- collection of a minimum of 13 core samples representing at least two cores per each four-acre unit area at randomly selected locations in the existing land treatment area;
- separate analysis of each core samples from individual depth segments (at least four depth intervals);
- soil-pore liquid sampling and analysis representing samples from at least two background lysimeters and twelve lysimeters in the treatment area;
- statistical analysis of analytical results;



- interpretation of data and discussion of results; and
- conclusions and recommendations.

III.F.5.: Treatment Demonstration Plan (Field Treatability Studies)

Please provide a detailed treatment demonstration plan for the land treatment unit. In accordance with 264.272, the treatment demonstration should provide sufficient data to confidently predict that hazardous constituents will be transformed, immobilized or otherwise degraded at the proposed unit to the extent necessary to prevent statistically significant releases of these constituents from the treatment zone.

(a) Nature and Characteristics of Waste for Treatment Demonstration:

Please present estimated quantities of hazardous and non-hazardous wastes to be landfarmed in terms of dry weight per unit area basis. For each hazardous waste, please indicate names of all potentially hazardous constituents and pertinent non-hazardous constituents reasonably expected to be present or derived from the waste. To the extent possible, please provide the concentration of each constituent on a mass basis. Please provide the estimated quantities of oil and grease in each waste to be landfarmed.

(b) Laboratory Test Design:

For each laboratory test, submit an explanation of each test with respect to objectives of the test, methods and materials, schedule of completion, list of operating conditions or characteristics that will or will not be simulated in the test such as climate, soil properties, and waste application rates; and description of the data that will be obtained from the test and how it will be presented in final form.

(c) Field Plot Testing:

For each field plot test, please provide a detailed description of how the test is designed and how it will be conducted. Please reorganize or revise your description to include the following information:

1. A scale drawing showing location, number, and size of test plots.
2. A discussion of the statistical/experimental design of the test;
3. Horizontal and vertical dimension of the treatment zone for the field test plots;
4. Details of preparation of test plots (e.g., tillage, liming fertilization, installation of monitoring devices, surface water control structures, etc.);

5. Waste application rate on each plot, method of waste application, and soil incorporation techniques;
6. Methods for measuring and recording meteorological data;
7. Procedures for monitoring soil, soil-pore liquid, run-off, ground water, and air as applicable;
8. Rationale for design and management of field tests to preclude the migration of hazardous constituents to ground or surface water;
9. Type of data expected from the test and how it will be presented in final form and interpreted;
10. Clean-up procedures upon completion of field tests; and
11. Schedule of completion.

In order to perform statistical analysis on collected data, the treatment demonstration unit shall use an experimental design which shall consist of no fewer than three replicate test plots for each treatment.

V.C.: Ground-water Monitoring

1. The proposed expansion of the land treatment unit will change the point of compliance. Please modify the monitoring system at the land treatment unit to include the previous point of compliance (downgradient) monitor wells and to include monitor wells MW51, MW52, MW53, and MW54. The inclusion of these wells will allow for detection of any changes in ground-water quality.
2. Other (non-RCRA) wells in the Class I Land Treatment Unit Area that should be monitored include MW46, MW47, MW48, Well 4 and Well 5. Please include these wells in the ground-water monitoring plan. The ground-water quality in the wells will show the background quality and detect any influence from the marsh and sludge area south of the Class I Land Treatment Unit.
3. Please provide copies of semi-annual/quarterly reports giving ground-water monitoring data for each monitor well for 1986.

V.D.: Unsaturated Zone Monitoring Plan

Please expand and/or reorganize your unsaturated zone monitoring program to include the following:

1. Identify background lysimeter locations in figure III-F-7. One additional lysimeter is needed for the background soils (untreated) area.



April 20, 1987

2. Add at least two more vacuum lysimeters, preferably one in Plot 3A and another one in plot 3B. Figure V-D-1 is missing; please submit it.
3. Provide copies of semi-annual/quarterly reports giving pore liquid analyses for each lysimeter for 1985 and 1986.
4. Please modify the soil core monitoring program to include samples representing at least two locations per each four-acre unit area at randomly selected locations in the land treatment area.
5. Data in tables IIA-IIE of Section III-F are not legible. Please resubmit these tables. Any new/additional data on treatment zone soils in the land treatment should also be submitted.

## VI. Closure

### VI.A.: General

Please provide step-by-step descriptions of closure procedures for surface impoundments to meet the requirements of TAC Section 335.169. At closure, Texaco is required to remove or decontaminate all waste residues, contaminated containment system components (liners, concrete walls, etc.), contaminated subsoils and structures and equipment contaminated with waste and leachate and manage them as hazardous waste (unless 40 CFR Section 261.3(d) applies).

The closure plan must be modified to be a self-supporting document independent of cross-reference to other portions of the permit application.

### VI.A.2.: Partial Closure Plan for Surface Impoundments

We understand that Texaco proposes to close the four oil ditch separators (impoundments) and convert them into an approved non-hazardous waste management facility. Please provide a step-by-step description of how and when the oil ditch separators/impoundments will be partially and finally removed from the hazardous waste management service and converted into an approved non-hazardous waste management facility.

TWC regulations require that an independent Registered Professional Engineer in Texas certify that closure was accomplished in accordance with the approved closure plan. Please list in your closure plan the key items that will need to be checked, including, but not limited to the following:

- Equipment clean-up and decontamination activities;
- Removal of any contaminated soils;
- Removal or decontamination of concrete walls and bases;



- A contingent closure plan to close the impoundment as a disposal facility; and
- Removal or reservicing of monitoring wells.

Include a time schedule for each activity and how these items will be accomplished for each waste management component being closed.

VI.A.5.: Closure of Land Treatment Unit

Please describe procedures that will be used to establish and maintain a vegetative cover on closed portions of the land treatment unit. The description should, at a minimum, include types and nature of cover crop adaptable to the region, planting materials and methods.

Summarize the verification tests to be performed and standards to be imposed at the time of closure to achieve a vegetative cover.

Provide a detailed description of a continued unsaturated zone monitoring plan, for maintenance of run-off and run-on control system, and for maintenance for wind dispersal control.

VII.A.: Cost Estimates for Closure

Please expand the section on cost estimates to include activities listed above under Sections V. and VI.

VII.B.2.: Post-closure Care Plan

Please provide a detailed description of the planned ground-water monitoring activities and frequencies at which they will be performed to comply with TAC Section 335.112, 335.116 and 335.117. Also provide a description of procedures for maintaining the ground-water monitoring system and reporting of data for the surface impoundments which are being closed.

For the land treatment unit, please provide a description of procedures for:

- Maintenance of vegetative cover over closed portions of the facility;
- Maintenance of run-on and run-off management system;
- Maintenance of unsaturated zone monitoring system; and
- Maintenance of wind dispersal control.

Please modify your cost estimate for post-closure care to include the items listed above.

Mr. L. T. Townsend  
Page 7  
April 20, 1987

VII. Financial Requirements for Closure and Post-Closure

Please modify or update the financial requirements report to reflect all revised or current closure and post-closure estimates.

VIII. Releases from Solid Waste Management Units

Table VIII-1 must identify all solid waste management units at the facility pursuant to 40 CFR 264.101. Please provide facility number for each unit in the second column of Table VIII-1 that is found in the left-hand column in Section III of your TDWR/TWC Notice of Registration. If not listed, an alphabetic designation should be assigned to such units. All the units must be clearly shown on the location map with appropriate scale.

Wastes managed by each of the units listed in Table VIII-1 are identified by waste code or verbal description. Revise this column of waste descriptions to correspond to Table III-1 for hazardous wastes and to TWC Code numbers or N.O.R. number for all wastes, where applicable.

Information on surface impoundments is summarized by a table (i.e., Part II - Impoundment inventory), but all of the required information is not given for all the impoundments. Please update this table and identify all the impoundments on the facility/location map with appropriate scale.

The information requested above is necessary for a complete hazardous waste permit application. An original and four copies of the application revisions must be submitted not later than 30 days from receipt of this letter. Note that failure to adequately address each of the items listed above within the time prescribed may result in a recommendation to deny the permit for this facility, or the administration of civil penalties for failure to complete a hazardous waste permit application.

Should you have any questions or desire to arrange a conference in Austin to discuss our review in detail, please Dr. Sam Gavande, P.E., at AC512/463-8173.

Sincerely,



Minor Brooks Hibbs, Chief  
Permits Section  
Hazardous and Solid Waste Division

SAG:bb

Enclosures

cc: ✓ William Honker, EPA - Dallas  
Shirley Workman, EPA - Dallas  
Lawrence E. Pewitt, TACB - Austin  
TWC H&SW Enforcement Section - Austin  
TWC District 6 Office - Orange



Kuss

# TEXAS WATER COMMISSION

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Ralph Roming, Commissioner  
John O. Houchins, Commissioner



*Platts*  
*Mayor*  
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Mary Ann Hefner, Chief Clerk  
James K. Rourke, Jr., General Counsel

May 22, 1986

Mr. L.T. Townsend  
Texaco U.S.A.  
P.O. Box 712  
Port Arthur, Texas 77640

TXD 008 097 529 II

Re: Industrial Solid Waste Registration No. 30121  
Partial Closure of Hazardous Waste Facility

Dear Mr. Townsend:

We have completed our review of the closure plan for the lead pit submitted November 22, 1985 and the closure plan amendments dated February 19, 1986. The closure plan has been evaluated pursuant to 31 Texas Administrative Code (TAC) Section 335.6(f). The applicable closure requirements of 31 TAC Sections 335.112(a)(6) which adopts by reference 40 CFR Part 265, Subpart G, and 40 CFR 265.228(a) and (b), have guided our review.

This letter constitutes approval by the Executive Director of the aforementioned closure plan, as modified below. Our evaluation indicates that your closure activities should provide reasonable assurance of effective industrial solid waste management, subject to the following modifications:

1. Background concentrations of total lead, benzene and toluene shall be determined by testing soils at the site that are unaffected by waste management activities of these parameters. A minimum of eight background samples shall be collected in areas which are unaffected by waste management activities. Also, these eight samples should be taken at different depths. A drawing showing the location, number, and depths of the background soil samples shall be submitted along with the analyses of these samples;
2. Background concentrations for each of the aforementioned parameters identified in Item 1 shall be established by calculating a mean and standard deviation and then determining the 95.5% confidence interval for each parameter (equal to the mean  $\pm$  2 standard deviations). In the event that all background samples show a parameter to be non-detectable, the decontamination objective shall then be equal to two times the detection limit for that parameter. However, in the event that only some of the background samples indicate a parameter to be non-detectable, the concentration of the parameter in those samples shall be assumed to be equal to one-half of the detection limit. The concentration of each parameter in each soil sample taken from the lead pit area must then be compared to the background concentration of that parameter. If the concentration of a parameter in any of the soil samples taken from the lead pit area exceeds the background concentration (as indicated by the upper limit of the 95.5% confidence interval or decontamination objective for that parameter), then the pit will be further excavated and resampled until the concentration of



each parameter in the sample no longer exceeds background concentration. After all soil removal has ceased, final soil samples shall be taken at the locations designated on Figure 2 from near the surface of the excavation (3 to 4 inches deep) and analyzed for the parameters identified in item 1, to confirm that no hazardous waste remains;

3. Soil samples collected shall be analyzed in accordance with Test Methods 8020 and either 7020 or 7021 as described in EPA Publication SW-846, Test Methods for Evaluating Solid Waste.
4. Closure shall be undertaken such that no waste, waste residue (including ground water), contaminated soil, liner, or standing liquids remaining in the pit exhibit any of the characteristics of hazardous waste identified in 40 CFR 261, Subpart C or contain any concentrations of those parameters listed in item 1 above background concentrations;
5. Representative samples of ground water, including background samples from an area unaffected by waste management activities, shall be collected and analyzed to determine whether or not the ground water has been impacted by the operation of the lead pit. Ground water samples shall be analyzed for the hazardous constituents listed in item 1 in accordance with the methodology referred to in item 3. Additionally, the ground water samples shall be analyzed for dissolved cations and anions and the results of a cation/anion balance shall be submitted;
6. The TWC District 6 Office shall be notified in writing at least 10 days prior to commencement of sampling to afford them the opportunity to co-sample and to select up to two additional sampling locations;
7. If it is determined that all hazardous waste and hazardous waste residues cannot be removed, then Texaco U.S.A. shall, within 60 days after said determination, submit to the Texas Water Commission (TWC) a closure and post-closure care plan for the "interim status" closure of the lead pit as a landfill. This closure and post-closure care plan must meet the requirements of 31 TAC Section 335.112(a)(6) and (13). The lead pit will be subject to the requirements of these plans when approved, until such time that a post-closure care permit is issued.
8. Upon completion of the closure activities, certification shall be submitted by the owner or operator of the subject facility as well as by an independent Registered Professional Engineer, that the lead pit has been closed in accordance with the approved, modified closure plan. These certifications should include a certification report containing data from the analyses of all soil and ground water samples, a scaled drawing indicating the location and depths of all soil removed, and an estimate of the volume of soil removed, and shall be submitted within 180 days from the date of this letter.

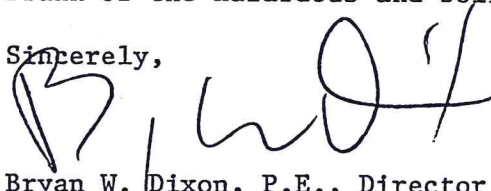
Mr. L.T. Townsend  
May 22, 1986  
Page 3

Also, we would like to inform you that recent correspondence from the U.S. Environmental Protection Agency (EPA) has clarified their position on the applicability of 40 CFR Part 264, Subpart F ground-water monitoring requirements to regulated units which close in accordance with the interim status closure requirements (see enclosed correspondence). The correspondence from EPA indicates that "you may be required, depending on the extent of contamination that remains after Part 265 closure, to undertake additional activities at a later date to come into compliance with applicable Part 264 ground-water monitoring and corrective action standards. The final test of whether additional activities will be required is whether the closed unit would have had additional Part 264 ground-water monitoring and corrective action obligations had it closed pursuant to a permit (recall that §3005(i) imposes the same Subpart F requirements on interim status units that they would have had if they had been permitted)".

Therefore, "where the applicant can demonstrate that he has already met the Part 264 'removal or decontamination' standard, no outstanding Part 264 Subpart F requirements would be deemed applicable under §3005(i), and thus, the Agency would not compel additional activities through a post-closure permit".

Should you have any questions regarding this matter, please contact Nancy E. Frank of the Hazardous and Solid Waste Permits Section at AC512/463-8183.

Sincerely,



Bryan W. Dixon, P.E., Director  
Hazardous and Solid Waste Division

NEF:af

Enclosure

cc: Bill Jacobs, REI - Houston, Texas  
Russell Kimble, Reports and Management Section  
Bill Brown, H&SW Division  
TWC District 6 Office - Orange



TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue  
Austin, Texas



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Executive Director

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July 31, 1985

Mr. R. L. Korbini  
Texaco Refining & Marketing  
P. O. Box 712  
Port Arthur, Texas 77640

*TXD 008097529 IV*

CERTIFIED MAIL

Dear Mr. Korbini:

Re: Industrial Solid Waste Registration No. 30121

The Texas Department of Water Resources (TDWR) is implementing the hazardous waste permitting program for industrial solid waste facilities in Texas. Our records indicate that you filed a state and/or federal Part A hazardous waste permit application for an operational hazardous waste storage, processing, and/or disposal facility as referenced above. In accordance with Title 31 Texas Administrative Code (TAC) Section 341.180, we hereby request submittal of Part B of your hazardous waste permit application, as well as any necessary modifications or additions to the Part A application already on file.

Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), amending the Resource Conservation and Recovery Act (RCRA), the Part B application and Part A modifications for any company operating disposal units should be submitted by November 8, 1985. By law, authorization to continue hazardous waste land disposal at your facility will terminate on this date if the complete application is not submitted. Therefore, your complete application is due November 8, 1985. If your facility does not include any disposal units subject to permitting, please contact the Solid Waste Section upon receipt of this letter.

The HSWA established new requirements for which the State has not yet received authorization. As a result, permits issued by the TDWR cannot completely satisfy the federal permit requirements, and a separate permit issued by EPA is necessary. To minimize duplication of effort, the State and EPA have executed a joint permitting agreement. Pursuant to this arrangement, the TDWR will take the lead in processing permit applications, thus serving as the primary contact for applicants. The TDWR will also develop permits under State authorities which can be issued by both agencies. Since we will transmit one copy to EPA Region VI and coordinate all subsequent permit processing steps with their office, all copies of your permit application should be submitted to the TDWR.

Please find enclosed for your use a blank Part A application form and a current copy of your TDWR Notice of Registration (NOR). If the Part A application currently on file with TDWR does not accurately reflect hazardous waste manage-



Mr. R. L. Korbini

Page 2

July 31, 1985

ment activities at the facility, then the Part A should be revised accordingly and submitted with the Part B application. If wastes currently listed on the Part A are no longer considered to be hazardous, you must submit appropriate documentation accompanying the revision to support the deletion. Likewise, if a unit is identified on the Part A which is not now considered to be a hazardous waste management unit, you must support the deletion by:

- 1) demonstrating that the unit has been or will be closed pursuant to a closure plan approved by the Executive Director;
- 2) demonstrating that the unit has not been used for hazardous waste management since November 19, 1980; or
- 3) demonstrating that the unit qualifies for an exclusion from permitting as prescribed in 31 TAC 335.2 and/or 335.69.

If you intend to delete hazardous waste or hazardous waste management units from the facility's Part A, you should upon receipt of this letter contact the Solid Waste Section and initiate the necessary actions. When you submit the facility's Part B permit application, it must fully address each hazardous waste and hazardous waste management unit which is identified on the Part A.

In revising your Part A application, please ensure that each waste and facility unit is identified by the appropriate waste classification code number and facility sequence number as noted in the NOR. If the NOR does not accurately reflect current waste management activities at the facility, please make the necessary corrections and submit a revised copy to the Solid Waste Section within 60 days of receipt of this letter. Each waste and facility unit identified in your Part A application should have the same waste code number and facility sequence number that are listed in your NOR.

Please also find enclosed for your use a copy of the industrial hazardous waste Part B permit application form and instructions. The instructions cover the technical requirements of the application in detail and are not to be submitted with the application. In order for you to meet the required submittal date, certain types of demonstrations, as applicable, must be initiated shortly after receiving this letter. As a result, you should upon receipt of this letter contact the Solid Waste Section and initiate necessary action if:

- 1) Your company intends to pursue any type of waiver or exemption;
- 2) Your company is required to do synthetic membrane liner compatibility testing (i.e., a 120-day test using EPA Test Method 9090) for new waste management units or lateral expansion of existing units; or
- 3) Your company is required to conduct field tests or laboratory analyses in conjunction with the treatment demonstration required for land treatment units.

Mr. R. L. Korbini

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July 31, 1985

Your company must also determine for each waste management area whether a detection ground-water monitoring program, a compliance monitoring program, or a corrective action program is required. If the presence of hazardous constituents has not been detected in the ground water at the time of the permit application, your company must submit sufficient information to establish a detection monitoring program. If a detection monitoring program is required, your company must prepare a ground water monitoring report in response to Section V of the Part B permit application which meets the informational requirements of 40 CFR 270.14(1), (2), (3), (5), and (6). If the presence of hazardous constituents has been detected in ground water at the point of compliance at the time of permit application, your company must submit sufficient information to establish a compliance monitoring program. If a compliance monitoring program is required, your company must prepare a compliance plan report in response to the Ground Water Compliance Plan Application which meets the informational requirements of 40 CFR 270.14(1), (2), (3), (4), (5), and (7). The conditions which would require your company to submit sufficient information to establish a corrective action program are described in 40 CFR 270.14(c)(8). You will find enclosed a copy of the Ground Water Compliance Plan Application which is for your use if either a compliance monitoring or corrective action program is required. In this event, the original and three copies of the Ground Water Compliance Plan Application must be submitted with the Part B.

In addition to the information specified in the Part B application form, HSWA and TDWR rules require the following:

1. An exposure assessment must be submitted. This assessment must address: (a) potential hazardous waste releases from transportation to or from the waste management unit(s), normal operations at the unit(s), and accidents; (b) potential pathways of human exposure from such releases; and (c) potential magnitude and nature of human exposure from such releases.
2. The location and areal extent of all non-hazardous waste disposal units (past and present) on the plant site which are not identified in the Part B application should be indicated on the plan-view drawing required in III.A.2. of the Part B [31 TAC 341.153(7)(C)];
3. The staffing pattern for the facility should be submitted including the qualifications of all key operating personnel whose duties include waste management [31 TAC 341.180(2)]; and
4. A physical description and current representative chemical analysis should be submitted for each waste which your company feels is not hazardous and which is commingled in a storage or disposal unit covered by the Part B application [31 TAC 341.180(3)].



Mr. R. L. Korbini  
Page 4  
July 31, 1985

Furthermore, HSWA sets forth minimum technological requirements on certain landfills and surface impoundments. Specifically, two or more liners, a leachate collection system above (in the case of a landfill) and between the liners, and ground-water monitoring are required for new landfill or surface impoundment units and for replacements or lateral expansions of existing landfill or surface impoundment units. Please refer to 40 CFR 264.221(c)-(e) and 264.301(c)-(e) and address these requirements in your Part B submittal accordingly.

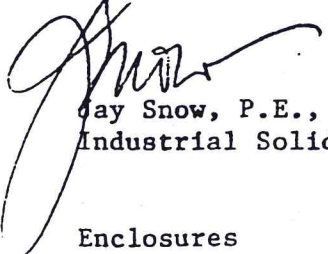
Please submit the original and two copies of your application including all related reports, together with six additional copies of Section I of the application form. For large, multiple-volume applications, please package only one set per box, where practical, and clearly mark which box contains the original.

Please avoid the submission of confidential information unless you feel it is essential. Each claim of confidentiality will be reviewed on a case-by-case basis. If confidential information must be submitted, please package the materials separately from the application and mark "Confidential" on the outside of the parcel. Any confidential material submitted should be referenced in your application although it is packaged separately. All claims of confidentiality must be substantiated at the time the information is submitted based on the Open Records Act, Article 6252-17a, V.A.C.S.

Once received, your application will be reviewed for administrative and technical deficiencies. Additional information may be requested at a later date to supplement your application.

Communications relating to Parts A and B of the permit application should be directed to the Solid Waste Section at AC512/463-8175. Communications relating to the Ground Water Compliance Plan Application should be directed to the Enforcement and Field Operations Division at AC512/463-7727.

Sincerely,



Jay Snow, P.E., Chief  
Industrial Solid Waste Section

Enclosures

cc: TDWR District 7 Office - Deer Park



# RECORD COMMUNICATION

☒ PHONE CALL   
 ☐ DISCUSSION   
 ☐ FIELD TRIP   
 ☐ CONFERENCE  
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: *SAM GAVANDE*

FROM: *Rich Mayer*

DATE *4-7-87*

TIME *10:00*

## SUBJECT

*Permitting Status of Texaco (Port Arthur)*

## SUMMARY OF COMMUNICATION

*NOD on Part B Application will be sent out*

*TXD 008 097 529 IF*

## CONCLUSIONS, ACTION TAKEN OR REQUIRED

## INFORMATION COPIES

TO: *R Franke*

DATA ENTRY FORM

E.P.A. IDENTIFICATION

TXD008097589

PREPARED

DHS

DATE

4-6-87

PRINT PLEASE PRINT PLEASE PRINT PLEASE

COMPANY NAME

MAILING ADDRESS

CITY

STATE ZIP CODE

COMPANY CONTACT PERSON

TELEPHONE NUMBER

MARSHALL, ODESSA

LOCATION ADDRESS

CITY

STATE ZIP CODE

OWNERS NAME

OWNERSHIP CODE

FACILITY STATUS

GEN TRN TSD UIC

B/B SOG

OTH OTHER CODE-

ADD WASTE CODES

DELETE WASTE CODES

ADD PROCESS CODES

DELETE PROCESS CODES

OTHER CODING

ENTERED BY

DATE



L T Townsend  
Manager  
Port Arthur Area

Texaco USA

PO Box 712  
Port Arthur TX 77640

September 11, 1986

Re: Submission of Waste Minimization Information  
Texaco Port Arthur Refinery (PAP) and  
Port Arthur Asphalt Complex (PAAC)  
EPA I.D. Nos. TXD008097529 and TXD980626022



Mr. Thomas D. Clark  
U.S. Environmental Protection Agency  
Hazardous Waste Programs Branch  
Administrative Section (6H-HA)  
1201 Elm Street  
Dallas, TX 75270

Dear Mr. Clark:

Please reference your August 1 subject letters to our facilities received August 7 and August 5, respectively. Attached is the completed 1985 EPA Generator Biennial Hazardous Waste Reports for PAP and PAAC. Both of the aforementioned facilities are under one hazardous waste management program at the Port Arthur Refinery. Therefore, the waste minimization techniques for both facilities are included under the refinery discussion, TXD008097529.

It should be noted that the letter with the EPA number for the refinery was directed to the attention of Mr. D. A. Mohr, who is with the Port Arthur Chemical Plant, not the refinery.

All correspondence relating to these facilities should be formally addressed to me.

Should questions arise, please contact Ms. Odessa Marshall at (409) 989-7166.

Yours very truly,

TEXACO REFINING AND MARKETING INC.

ORM:JMB

Attachments



PT.  
10/27

OCT 27 1987

Mr. Minor Hibbs, Chief  
Hazardous and Solid Waste Permits Section  
Texas Water Commission  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711

Re: Texaco Refining and Marketing, Inc.  
EPA I.D. No. TXD008097529

Dear Mr. Hibbs:

On September 21, 1987, the Environmental Protection Agency (EPA), Region VI received a joint draft permit for the above mentioned facility, prepared by the Texas Water Commission (TWC). This document establishes provisions for the land treatment unit and container storage area.

We have completed a review of the draft permit and offer the enclosed comments for your consideration. The comments address the criteria for issuing a full Resource Conservation and Recovery Act (RCRA) permit to the facility, and include technical comments, as well as specific permit provisions required by the Hazardous and Solid Waste Amendments of 1984 (HSWA) which should be included in the joint draft permit.

Please contact me or Joe Korpics of my staff at (214) 655-6785 if you have any questions or if we can assist you further.

Sincerely yours,

Sam Becker, P.E.  
Chief  
Hazardous Waste Compliance Branch

Enclosures

6H-CP:KORPICS:pt:5-6785:10-19-78:FILE CODE:

6H-CP      6H-CP  
Honker     Franke

Comments on Initial Draft Permit for  
Texaco Refining and Marketing, Inc.  
(EPA I.D. Number TXDOO8907529, State Number HW-50188)

A. Major HSWA Comments

1. Part VI.CC should utilize the following revised boilerplate:

The permittee shall comply with the land disposal restrictions as found in 40 CFR 268 (Fed. Reg. November 7, 1986, June 4, 1987, July 8, 1987 and any subsequent applicable promulgations).

B. Major RCRA Comments:

1. Part III.A.9 should include provisions which allow the Executive Director to revoke and reissue the permit (40 CFR 270.41), terminate the permit (40 CFR 270.43), or require corrective action (40 CFR 264.90 and 264.100) based on the results of the reconnaissance investigation.
2. Part IV.G.1.d essentially tracks 40 CFR 264.175(b)(3). However, the draft permit should not mention tanks in this paragraph since only the container regulations (i.e. 240 CFR Subpart I) are applicable. To that end, the word "tank" should be replaced by "container", and the phrase "and/or liquid container capacity" should be removed.
3. The closure and post-closure requirements for the land treatment units should prohibit the growth of food chain crops in or on the treatment zone pursuant to 40 CFR 264.280(c)(6).
4. Part IV.E.4.f(4) conflicts with the requirements of 40 CFR 264.278(g). To resolve this discrepancy, the word "or" should be added at the end of Part IV.E.4.f(3).
5. Pursuant to 40 CFR 270.12, confidentiality of information should be addressed in the permit.
6. Pursuant to 40 CFR 264.110, the permit should require full compliance with the closure/post-closure care requirements if the LTD results suggest that Phase II should not be implemented. Pursuant to 40 CFR 264.90 and 264.100, the permit should also address implementation of a corrective action program if the groundwater monitoring reveals a problem during the LTD.

C. Additional Comments:

1. Part III.B.5.a references Attachment B for the depiction of a 24-foot-wide sub area in plot 3A. Although plot 3A is readily identifiable on the Attachment, the exact location of the sub area is unclear.
2. The references to "Attachment H" in Parts IV.F.4.a(1) and (2) and IV.F.4.b should be changed to "Attachment G".



3. Several ambiguities arise from the language in Part IV.E:
  - a. Part IV.E.1.b states that monitoring during the operating life, closure and post-closure care period of the facility is only required immediately below the treatment zone; yet, Part IV.E.1.b(3) references Attachment D, which requires sampling at depths 0-12" and 60-78".
  - b. The wording of Part IV.E.1.b suggests that only the LTU is subject to Parts IV.E.1.b(1)-(3). The parameters, locations, and frequencies associated with the LTD, and background areas are thus unclear.
  - c. Part IV.E.4.e.(1) states that soil-pore background levels for organics should be assumed to be below detection levels; however, actual background levels are established per Part IV.E.3.b.
  - d. Part IV.E.1.a(2) requires background soil core samples to be collected at several depths; however, Attachment D states that soil sampling depths for background and treatment area data shall be 0-12" and 60-70".
  - e. The language of Part IV.E.3 suggests that only the LTD and LTU active areas are subject to IV.E.3.a-c. The parameters, locations, and frequencies associated with the background areas are thus unclear. A reference to Attachment D in Part IV.E.2 is a possible solution.
4. Consideration should be given to soil core data collection at several depths throughout the active soil during the operating life of the LTU.
5. During the LTD, statistical analyses are conducted on sampling results in accordance with Parts III.B.3 and IV.E.4.d. These results should be presented in the final LTD report.
6. The technical summary does not summarize the basis for the draft permit conditions, as required by 40 CFR 124.8(b)(4). The summary should include specific references to applicable statutes, regulations, and supporting material in the administrative record.
7. Part IX should require submittal of the RFI workplan (IX.C) and final report (IX.F) to EPA in addition to TWC. Also, Part IX.D should require RFI work plan approval from EPA as well as TWC.
8. In Part II.A, the third paragraph suggests that the facility is authorized to manage any waste specified in the Hazardous Code Groups, irrespective of the wastes delineated in the Waste Description (Part II.A.2). This is particularly a problem for LTU's since the move to Phase II is based on an LTD for the permitted wastes.



To resolve this problem, the third paragraph could be reworded as follows:

"Hazardous wastes authorized to be managed under this permit are limited as follows:

1. The hazardous waste must be in the Hazard Code Groups (as prescribed by the U.S. Environmental Protection Agency regulations in effect upon date of permit approval) indicated below:

<u>  x  </u>	Ignitable Waste (I)	<u>      </u>	Acute Hazardous Waste (H)
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2. The hazardous wastes must be included in the following waste description: "(no further changes).
9. The technical summary should mention that the facility is located in the flood plain, and describe the associated controls included in the permit.
10. Compliance point well MW-60 is not shown on Attachment F.

D. Minor Typographical Errors:

1. Part II.C should reference VI.U instead of V.U.

PT  
10/29

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

~~III~~  
II

OCT 27 1987

Mr. Minor Hibbs, Chief  
Hazardous and Solid Waste Permits Section  
Texas Water Commission  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711

Re: Texaco Refining and Marketing, Inc.  
EPA I.D. No. TXD008097529

Dear Mr. Hibbs:

On September 21, 1987, the Environmental Protection Agency (EPA), Region VI received a joint draft permit for the above mentioned facility, prepared by the Texas Water Commission (TWC). This document establishes provisions for the land treatment unit and container storage area.

We have completed a review of the draft permit and offer the enclosed comments for your consideration. The comments address the criteria for issuing a full Resource Conservation and Recovery Act (RCRA) permit to the facility, and include technical comments, as well as specific permit provisions required by the Hazardous and Solid Waste Amendments of 1984 (HSWA) which should be included in the joint draft permit.

Please contact me or Joe Korpics of my staff at (214) 655-6785 if you have any questions or if we can assist you further.

Sincerely yours,

Sam Becker, P.E.  
Chief  
Hazardous Waste Compliance Branch

Enclosures

10/22 10/19/87  
6H-CP:KORPICS:pt:5-6785:10-19-78:FILE CODE:

CONCURRENCES

SYMBOL	6H-CP	6H-CP						
	Hooper	Frank						
SURNAME								
DATE	10/23	10/23						

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## DRAFT HAZARDOUS WASTE MANAGEMENT PERMIT

- I. Facility: TEXACO REFINING EPA ID No. TXD 008097529
- II. Location: PORT ARTHUR, TX State ID No. HW-50188
- III. Facility Manager: KORPICS
- IV. State Contact: LEON BYRD
- V. Permit Priority: D
- VI. Quarterly Commitment: 1/89
- VII. Type of Permit:
- a. ☒ State Drafted Joint Permit  
☐ EPA Drafted HSWA Permit  
☐ State Drafted RCRA Permit
  - b. ☒ Operating Permit  
☐ Post Closure Permit
  - c. ☒ Land Disposal  
☐ Incinerator  
☒ Storage and Processing ONSITE CONTAINER STORAGE  
☐ Other ( )
- VIII. RFA Completed:
- a. ☒ yes (date: 9/8/87)
  - b. ☐ no
- IX. Draft Received Date: 9/21/87
- X. Comments due date: 10/21/87
- XI. Expected to be Controversial: ☒ no  
☐ yes (explain: \_\_\_\_\_)
- \_\_\_\_\_ )

Unit Leader Review: FRANKESection Chief Review: HONKER



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# TEXAS WATER COMMISSION

Paul Hopkins, Chairman  
John O. Houchins, Commissioner  
B. J. Wynne, III, Commissioner



C. Martin Wilson III, General Counsel  
James K. Rourke, Jr., Chief Examiner  
Mary Ann Hefner, Chief Clerk

Larry R. Soward, Executive Director

September 18, 1987

Mr. Sam Becker, P.E., Chief  
Hazardous Waste Compliance Branch  
U.S. Environmental Protection Agency  
Region VI - 6H-C  
Allied Bank Tower  
1445 Ross Avenue, 12th Floor  
Dallas, Texas 75202-2733



Re: Transmittal of Draft Hazardous Waste Permit

Dear Mr. Becker:

In accordance with the the Memorandum of Agreement (MOA) between the State of Texas and the U.S. Environmental Protection Agency, transmitted herewith is the draft hazardous waste permit for Texaco Refining & Marketing, Inc. Provisions VI. AA., BB., CC., EE., and Section IX. of the draft permit will implement the applicable requirements of the Hazardous and Solid Waste Amendments of 1984 (HSWA).

Questions or comments should be directed to the staff coordinator indicated below.

<u>Applicant</u>	<u>Coordinator</u>	<u>Permit No.</u>	<u>EPA I.D. No.</u>
Texaco Refining and Marketing, Inc.	Leon Byrd	HW-50188	TXD008097529

Sincerely,

*Handwritten: Ray H. Austin*  
Minor Brooks Hibbs  
Permits Section  
Hazardous and Solid Waste Division

CLB:lc  
Enclosure

cc: Shirley Workman, EPA - Dallas